September 12, 2002

Mr. David Smith
Alpha Systems, Inc.
5120 Beck Drive
Elkhart, IN 46516

Re: **039-16257-00504**
First Administrative Amendment to
Part 70 039-12831-00504

Dear Mr. Smith:

Alpha Systems, Inc. was issued a permit on March 22, 2002 for a fiberglass molds and plastic/vacuum formed items manufacturing operation. A letter requesting a change was received on July 24, 2002. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Alpha Systems, Inc. has submitted an application to change the responsible official and replace a dust collection system, identified as DC-1, with a 50,000 cubic feet per minute pulse jet return-air baghouse collection system.

The change in responsible official is determined to be acceptable because the proposed official, David Smith, is the owner and president, which satisfies the criteria under 326 IAC 2-7-1(34). The change in responsible official shall be incorporated into the Part 70 permit administratively pursuant to 326 IAC 2-7-11(a)(2) which states that changes that identify a change in name, address, or telephone number of any person identified in the Part 70 permit, or provides a similar minor administrative change at the source, may be incorporated into the permit via an administrative amendment.

The proposed baghouse is not an emission unit and will not cause an increase in production at any existing emission units or processes because the baghouse is a control device that operates independent of the existing units. Thus, there are no emissions associated with the proposed change.

In addition, the proposed baghouse will not trigger any new requirements or change the status of any existing requirements of the existing Part 70 permit.

The proposed baghouse shall therefore be incorporated into the existing Part 70 permit via an administrative amendment pursuant to 326 IAC 2-7-11(a)(8) which states that changes that revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term may be incorporated into the operating permit via an administrative amendment.

To incorporate the proposed changes into the existing Part 70 permit, the following changes to the permit shall be made:

(1) Condition A.2: Condition A.2 shall be amended as follows to reflect the change in the responsible official from Steve Rusincovitch to David V. Smith, Jr.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates two (2) plants on Beck Drive which manufacture adhesives, fiberglass counter tops, and sinks, and one (1) plant on Protecta Drive Plant which manufactures fiberglass molds and plastic/vacuum formed items.

Responsible Official: ~~Steve Rusincovitch~~ **David V. Smith, Jr.**

(2) Condition A.3, Part (e): Part (e) of Condition A.3 shall be changed as follows to reflect the replacement baghouse.

(e) One (1) flat sheet open molding line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1, FS-2 for finishing as a final product. This operation is capable of sawing and sanding 1614 pounds per hour of product.

One (1) **50,000 CFM pulse jet baghouse** dust collecti**on**~~r~~ **system**, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1.

(3) Unit Description of Section D.1: The unit description of Section D.1 shall be amended as follows to reflect the replacement baghouse.

Description [326 IAC 2-7-5(15)]:
.....
(e) .....One (1) **50,000 CFM pulse jet baghouse** dust collecti**on**~~r~~ **system**, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1. .....

(4) The Last Paragraph of Condition D.1.3: The last paragraph of Condition D.1.3 shall be amended as follows to reflect the proposed baghouse.

.....
The correlating **50,000 CFM pulse jet baghouse dust collection system,** dust collectors**,** and dry filters shall be in operation at all times the sawing and sanding, abrasive blasting, flat bed sanders and hand grinders, woodworking and plastics machining, and the marble top mold booth are in operation, in order to comply with this limit.

(5) Part (a) of Condition D.1.7: Part (a) of Condition D.1.7 shall be changed as follows to reflect the proposed baghouse.

D.1.7 Monitoring
(a) The sawing and sanding operation, blasting, **and** hand grinding, all controlled by **either** dust collectors **or a pulse jet baghouse dust collection system,** have applicable compliance monitoring conditions as specified below:

(6) Part (a)(2) of Condition D.1.7: Part (a)(2) of Condition D.1.7 shall be changed as follows to include the proposed baghouse.

(2) Parametric Monitoring:

(A) The Permittee shall take readings of the total static pressure drop across the dust collector**s and pulse jet baghouse dust collection system**, a~~s~~**t** least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector**s** shall be maintained within the range of 3 to 6 inches of water **and the pressure drop across the pulse jet baghouse dust collection system shall be maintained within the range specified by the manufacturer**. The Preventive Maintenance Plan for the dust collector should be followed when the pressure reading is outside of this range for any one reading.

(B) An inspection shall be performed each calendar quarter of the dust collectors **and pulse jet baghouse dust collection system**. Defective dust collectors **and/or baghouse components** shall be replaced. A record shall be kept of the results of the inspections and the number of dust collectors **and/or baghouse components** replaced.

(C) In the event that a dust collector~~'s~~ **and/or baghouse** failure has been observed:

(i) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz, Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Alpha Systems, Inc.
5100 Beck Drive,
5120 Beck Drive, and
21680 Protecta Drive
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-12831-00504	Date Issued: March 22, 2002

First Administrative Amendment No.: 039-16257-00504	Affected Pages: 4, 5, 25, 26, 27, 28, and 29, with 4a and 27a added.
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky Branch Chief, Office of Air Quality	Date Issued: September 12, 2002

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates two (2) plants on Beck Drive which manufacture adhesives, fiberglass counter tops, and sinks, and one (1) plant on Protecta Drive Plant which manufactures fiberglass molds and plastic/vacuum formed items.

Responsible Official:	David V. Smith, Jr.
Source Address:	5100 Beck Drive, Elkhart, Indiana 46516 5120 Beck Drive, Elkhart, Indiana 46516 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address:	5120 Beck Drive, Elkhart, Indiana 46516
SIC Code:	2189, 3088
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This adhesive, fiberglass sink and countertop manufacturing operation consists of two (2) plants:

(a) Beck Drive Plant (two (2) buildings), located at 5120 and 5100 Beck Drive, Elkhart, Indiana 46516; and

(b) Protecta Drive Plant, located at 21680 Protecta Drive, Elkhart, Indiana 46516.

The two (2) plants are owned by one (1) individual, located on the same property (contiguous property) and have the same owner but have different SIC codes: The Beck Drive Plants manufacture adhesives, fiberglass counter tops, and sinks, used exclusively by the motor home industry, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass molds and plastic/vacuum formed items, with an SIC code of 3088. This determination was previously made in Minor Permit Revision No. 039-11874-00504 (to MSOP No. 039-11066-00504), issued on March 30, 2000.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

5120 Beck Drive Building

(a) One (1) existing mix tank, used in the solvent-based adhesives production area, designed as M-1, increased maximum capacity to 500 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

(b) One (1) existing mix tank, used in the solvent-based adhesive production area, designed as M-2, increased maximum capacity to 400 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

(c) One (1) mix tank, used in the solvent-based adhesive production area, designed as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

5100 Beck Drive Building

(d) One (1) stone mixer, identified as M1 which has a rated capacity of 2,219 pounds per hour (lb/hr). This mixer can only feed one (1) line at a time, either the flat sheet molding line, FS1 or the sink/counter top molding, C1.

(e) One (1) flat sheet open molding line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1, FS-2 for finishing as a final product. This operation is capable of sawing and sanding 1614 pounds per hour of product.

One (1) 50,000 CFM pulse jet baghouse dust collection system, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1.

(f) One (1) sink/counter top closed molding line, identified as C1 which is capable of molding 34 parts per hour. From this process, the parts are conveyed to the 0.8 million Btu/hr (MMBTU/hr) natural gas-fired dryer, identified D1 for drying as a final product.

(g) One (1) stone mixer, designed as SM-1B, with a maximum capacity of 1500 lbs/hr and exhausts into the building.

(h) Two (2) manual mixer, designed as MM-1 and MM-2, with a maximum capacity of 430 lbs each and exhausts into the building.

(i) Miscellaneous use of solvents, waxes, cleaners and other VOC containing materials used to manufacture marble flat sinks and bowls.

(j) One (1) Empire Blast Cabinet used to sand blast the marble tops, sinks and flat tops, vented to a dust collector designed as DC-2 and then internally.

(k) Ten (10) hand grinders used for the final finish touch up operations are vented to dust collectors, designated as DC-3 to DC-6 and then internally. This operation is capable of grinding 538 pounds per hour.

Protecta Drive Plant:

(l) One (1) marble top mold booth, designated as #1, with a maximum throughout of 0.125 units per hour, consisting of gel coat and resin application, controlled by dry filters for particulate matter over spray and exhausts to one (1) stack designated as SV-001.

(m) One (1) glue line for polycarbonate skylights, with a maximum throughput of 37.7 units per hour and exhausts to the atmosphere.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) woodworking and plastics machining area, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausts to the atmosphere.(326 IAC 6-3-2)

(b) Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks. (326 IAC 8-9)

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);
(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Description [326 IAC 2-7-5(15)]:
5120 Beck Drive Building

(a) One (1) existing mix tank, used in the solvent-based adhesives production area, designed as M-1, increased maximum capacity to 500 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

(b) One (1) existing mix tank, used in the solvent-based adhesive production area, designed as M-2, increased maximum capacity to 400 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

(c) One (1) mix tank, used in the solvent-based adhesive production area, designed as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

5100 Beck Drive Building

(d) One (1) stone mixer, identified as M1 which has a rated capacity of 2,219 pounds per hour (lb/hr). This mixer can only feed one (1) line at a time, either the flat sheet molding line, FS1 or the sink/counter top molding, C1.

(e) One (1) flat sheet open molding line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1, FS-2 for finishing as a final product. This operation is capable of sawing and sanding 1614 pounds per hour of product.

One (1) 50,000 CFM pulse jet baghouse dust collection system, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1.

(f) One (1) sink/counter top closed molding line, identified as C1 which is capable of molding 34 parts per hour. From this process, the parts are conveyed to the 0.8 million Btu/hr (MMBtu/hr) natural gas-fired dryer, identified D1 for drying as a final product.

(g) One (1) stone mixer, designed as SM-1B, with a maximum capacity of 1500 lbs/hr and exhausts into the building.

(h) Two (2) manual mixer, designed as MM-1 and MM-2, with a maximum capacity of 430 lbs each and exhausts into the building.

(i) Miscellaneous use of solvents, waxes, cleaners and other VOC containing materials used to manufacture marble flat sinks and bowls.

(j) One (1) Empire Blast Cabinet used to sand blast the marble tops, sinks and flat tops, vented to a dust collector designed as DC-2 and then internally.

(k) Ten (10) hand grinders used for the final finish touch up operations are vented to dust collectors, designated as DC-3 to DC-6 and then internally. This operation is capable of grinding 538 pounds per hour.

Facility Description [326 IAC 2-7-5(15)] (continued):
Protecta Drive Plant:

(l) One (1) marble top mold booth, designated as #1, with a maximum throughout of 0.125 units per hour, consisting of gel coat and resin application, controlled by dry filters for particulate matter over spray and exhausts to one (1) stack designated as SV-001.

(m) One (1) glue line for polycarbonate skylights, with a maximum throughput of 37.7 units per hour and exhausts to the atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Hazardous Air Pollutant (HAP) Limit [326 IAC 2-4.1]

Pursuant to the Significant Permit Revision 039-12282-00504, (issued December 4, 2000) to MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building (as described above) the input HAP shall be less than 10 tons of a single HAP or twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period so that the requirements of 326 IAC 2-4.1 (Toxics) do not apply.

D.1.2 BACT VOC Limit [326 IAC 8-1-6]

Pursuant to the Significant Permit Revision 039-12282-00504, (issued December 4, 2000) to MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building, the input VOC shall be less than 25 tons per consecutive twelve (12) month period, so that the requirements of 326 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from

(a) sawing and sanding with a process weight rate of 1614 pounds per hour shall not exceed 3.55 lb or PM per hour,
(b) blasting with a process weight rate of 1 pound per hour shall not exceed 0.02 lb of PM per hour,
(c) flat bed sanders and hand grinders with a process weight rate of 538 pounds per hour shall not exceed 1.7 lb of PM per hour,
(d) marble top mold booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The correlating 50,000 CFM pulse jet baghouse dust collection system, dust collectors, and dry filters shall be in operation at all times the sawing and sanding, abrasive blasting, flat bed sanders and hand grinders, woodworking and plastics machining, and the marble top mold booth are in operation, in order to comply with this limit.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with Condition D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) consecutive month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

Pursuant to MSOP 039-11066-00504, issued on October 6, 1999, and in order to comply with D.1.3, the corresponding PM control equipment shall be in operation and control emissions from the sawing and sanding, blasting, flat bed sanders and hand grinders, and marble top mold booth at all times when the facilities are in operation.

D.1.7 Monitoring

(a) The sawing and sanding operation, blasting, and hand grinding, all controlled by either dust collectors or a pulse jet baghouse dust collection system, have applicable compliance monitoring conditions as specified below:

(1) Visible Emissions Notations

(A) Visible emission notations of the blasting stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(B) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(C) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(D) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(E) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Parametric Monitoring:

(A) The Permittee shall take readings of the total static pressure drop across the dust collectors and pulse jet baghouse dust collection system, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the range of 3 to 6 inches of water and the pressure drop across the pulse jet baghouse dust collection system shall be maintained within the range specified by the manufacturer. The Preventive Maintenance Plan for the dust collector should be followed when the pressure reading is outside of this range for any one reading.

(B) An inspection shall be performed each calendar quarter of the dust collectors and pulse jet baghouse dust collection system. Defective dust collectors and/or baghouse components shall be replaced. A record shall be kept of the results of the inspections and the number of dust collectors and/or baghouse components replaced.

(C) In the event that a dust collector and/or baghouse failure has been observed:
(i) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(b) The spray coating has applicable compliance monitoring conditions as specified below:
(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the over spray from the surface coating booth stack SV-001 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and/or D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and/or D.1.2.
(1) The amount and VOC/HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC/HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each day month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOCs/HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.7(a), the Permittee shall maintain a log of weekly readings and quarterly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.7(b), the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).